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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CALIFORNIANS FOR ALTERNATIVES TO
TOXICS,

Plaintiff,

vs.

TRAVIS MOREDA DAIRY and TRAVIS
MOREDA,

Defendants.

Case No. 3:24-CV-06632-SI

**STIPULATED REQUEST FOR ORDER
EXTENDING DEADLINES SET BY
COURT (L.R. 6-1, 6-2); [PROPOSED]
ORDER**

*[Filed concurrently with Declaration of
Alexander Moore]*

*Assigned for all purposes to the
Honorable Susan Illston*

STIPULATION

Pursuant to Local Rules 6-1 and 6-2, as supported by the accompanying Declaration of Alexander Moore, Plaintiff Californians for Alternatives to Toxics (“CATs”) and Defendants Travis Moreda and Travis Moreda Dairy (collectively “TMD,” and together with CATs, the “Parties”) through undersigned counsel hereby stipulate and respectfully request that the Court extend all deadlines currently set by the Court by sixty (60) days. The Parties declare in support of this request:

WHEREAS, on November 22, 2024, the Court granted TMD’s Motion to Extend Time, extending TMD’s time to respond to CATs’ Complaint from November 25, 2024 to December 27, 2024, and extending all deadlines set by the Court’s Initial Case Management Scheduling Order and ADR Deadlines by 30 days (ECF No. 11);

WHEREAS, on January 2, 2025, the Court granted TMD’s Unopposed Motion for Extension of Time to File Answer, extending TMD’s time to file its Answer from December 27, 2024 to December 30, 2024 (ECF No. 15);

WHEREAS, on January 22, 2025, the Parties met and conferred pursuant to Federal Rule of Civil Procedure 26(f);

WHEREAS, also on January 22, 2025, the Parties each timely filed the ADR Certification;

WHEREAS, the Parties have engaged in settlement discussions, and CATs is preparing a settlement proposal for TMD’s review; and

WHEREAS, the Parties each commit to a good-faith effort to resolve this case within 60 days to conserve the expenditure of attorneys’ fees and costs in litigation, and therefore the Parties agree to seek a 60-day extension to all deadlines currently set by Court order.

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ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that all signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Dated: January 27, 2025

KING & SPALDING LLP

By: /s/ Alexander Moore
Alexander Moore

Attorneys for Defendants